IN THE

Supreme Court of the United States

UNITED STATES,

Petitioner,

v.

REFUGIO PALOMAR-SANTIAGO,

Respondent.

AFFIDAVIT OF SERVICE

I HEREBY CERTIFY that all parties required to be served, have been served, on this 31st day of March, 2021, in accordance with U.S. Supreme Court Rule 29.3, three (3) copies of the foregoing **BRIEF OF AMICUS CURIAE THE NATIONAL ASSOCIATION OF CRIMINAL DEFENSE LAWYERS IN SUPPORT OF RESPONDENTS** by placing said copies in the U.S. mail, first class postage prepaid, addressed as listed below.

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OTAP C6/14/2026 OF CO

KAREN PIERANGELI

NOTARY PUBLIC, DISTRICT OF COLUMBIA

My Commission Expires June 14, 2025.